

WAYNE STRUMPFER  
Acting California Corporations Commissioner  
ALAN WEINGER (CA BAR NO. 86717)  
Acting Deputy Commissioner  
MICHELLE LIPTON (CA Bar No. 178078)  
Senior Corporations Counsel  
Department of Corporations  
320 West 4<sup>th</sup> Street, Ste. 750  
Los Angeles, California 90013-2344  
Telephone: (213) 576-7591  
Facsimile: (213) 576-7181

Attorneys for the People of the State of California

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

THE PEOPLE OF THE STATE OF  
CALIFORNIA, BY AND THROUGH THE  
CALIFORNIA CORPORATIONS  
COMMISSIONER,

Plaintiff,

vs.

LEEDHA, INC., d.b.a. FLINTRIDGE ASSET  
MANAGEMENT COMPANY; a California  
corporation;  
EARL D. ANSCHULTZ, an individual, and  
DOES 1 through 10, Inclusive,

Defendants.

) Case No.: BC343931  
)  
) EX PARTE APPLICATION FOR  
) TEMPORARY RESTRAINING ORDER AND  
) ORDER TO SHOW CAUSE RE  
) PRELIMINARY INJUNCTION  
)  
) DATE: 12/9/05  
) TIME: 8:30 a.m.  
) DEPT.: 85  
) JUDGE: Honorable Dzintra Janavs  
) ACTION FILED: 12/5/05  
)  
)  
)  
)

The People of the State of California, by and through the California Corporations  
Commissioner ("Plaintiff" or "Commissioner"), hereby apply for:

1. An Order directing defendant Earl D. Anschultz (Anschultz) to show cause, why a  
preliminary injunction should not be granted enjoining Anschultz and his partners, successors in  
interest, agents, employees, attorneys in fact, and all persons acting in concert or participating with  
him from directly or indirectly:

A. violating California Corporations Code section 25230 by acting as an investment

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1 adviser without a license;

2 B. violating California Corporations Code Section 25235(b) by engaging in  
3 transactions, practices, or a course of business to defraud or deceive any client or prospective client;

4 C. violating the Desist and Refrain Order, dated April 26, 2001;

5 D. violating the Stipulated Bar Order issued against Defendant Anschultz, dated  
6 October 1, 2005; and

7 E. removing, destroying, mutilating, concealing, altering, transferring, or otherwise  
8 disposing of, in any manner, any books, records, computer programs, computer files, computer  
9 printouts, correspondence, brochures, manuals, or other writings or documents of any kind as  
10 defined in California Evidence Code Section 250 relating to the transactions and course of conduct  
11 as alleged in the complaint, unless authorized by this Court.

12 2. A Temporary Restraining Order enjoining Anschultz and his partners, successors in  
13 interest, agents, employees, attorneys in fact, and all persons acting in concert or participating with  
14 him from directly or indirectly:

15 A. violating California Corporations Code section 25230 by acting as an investment  
16 adviser without a license;

17 B. violating California Corporations Code Section 25235(b) by engaging in  
18 transactions, practices, or a course of business to defraud or deceive any client or prospective client;

19 C. violating the Desist and Refrain Order, dated April 26, 2001;

20 D. violating the Stipulated Bar Order issued against Defendant Anschultz, dated  
21 October 1, 2005; and

22 E. removing, destroying, mutilating, concealing, altering, transferring, or otherwise  
23 disposing of, in any manner, any books, records, computer programs, computer files, computer  
24 printouts, correspondence, brochures, manuals, or other writings or documents of any kind as  
25 defined in California Evidence Code Section 250 relating to the transactions and course of conduct  
26 as alleged in the complaint, unless authorized by this Court.

27 This application is made on the grounds that the Commissioner is authorized by law to the  
28 relief demanded and this relief is necessary to provide the greatest protection to the public, as more

1 particularly described in the Memorandum of Points and Authorities and Declarations, filed  
2 herewith.

3 This ex parte application is based upon the Complaint, Memorandum of Points and  
4 Authorities, Declaration Re Ex Parte Notice, declarations and exhibits of Michelle Lipton, Rebecca  
5 E. Gutierrez, Robert DeBlasis and Stephen Russell, any requests for judicial notice, and such other  
6 oral and documentary evidence as may be presented at the time of the hearing on the application.

7 The address and telephone number of Defendant Earl D. Anschultz is 2540 Huntington  
8 Drive, Suite 104, San Marino, California, 91108, (626) 286-2620.

9 A previous application for a temporary restraining order and order to show cause re:  
10 preliminary injunction for similar relief was made on December 7, 2005, at 8:30 a.m. in Department  
11 85. Judge James E. Satt denied the application for failure to state with specificity the relief sought as  
12 required under California Rules of Court 379(e).

13 Dated: December 7, 2005

14 WAYNE STRUMPFER  
15 Acting California Corporations Commissioner

16 By \_\_\_\_\_  
17 MICHELLE LIPTON  
18 Senior Corporations Counsel  
19 Enforcement Division  
20 Attorneys for Plaintiff  
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